

UNITED STATES DISTRICT COURT

DISTRICT OF DELAWARE

ADAM WENZKE,)	
)	Case No. 007-504 SLR
Plaintiff,)	JURY TRIAL DEMANDED
v.)	
)	
CORRECTIONAL MEDICAL SYSTEMS,)	
DR. TADEO, DR. DOROSIER,)	
MR. ALTON, DR. SMITH,)	
MR. JIM WELCH, BETTY BRADLEY,)	
NECHELLE D. BUTCHER, and)	
STEPHANIE MOWBRAY,)	
)	
Defendants.)	

**DEFENDANT CORRECTIONAL MEDICAL SERVICES, INC.'S
FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO PLAINTIFF**

Defendant Correctional Medical Services, Inc.¹. ("CMS") by and through its undersigned counsel, requests production of the following documents within thirty (30) days from the date hereof at the offices of Balick & Balick LLC, 711 King Street, Wilmington, Delaware²:

1. All documents referred to in Plaintiffs' Answers to Interrogatories.

RESPONSE:

2. Copies of all documents which are relevant, in whole or in part, to

¹ Incorrectly identified as Correctional Medical

² The instructions and definitions set forth in Defendant's Interrogatories Directed to Plaintiff are incorporated herein by reference.

plaintiff's claim for damages (including but not limited to medical reports, income and tax records).

RESPONSE:

3. Copies of all documents which are relevant, in whole or in part, to plaintiff's claim for lost wages.

RESPONSE:

4. If you claim any loss of support, loss of income, loss of future income, or impairment of earning capacity in this lawsuit, please produce Federal and State income tax returns for the years 1998 through the present.

RESPONSE:

5. Copies of all bills and receipts evidencing payment of bills for which the plaintiff seeks compensation in this lawsuit.

RESPONSE:

6. Copies of the curriculum vitae of all experts you intend to call at trial.

RESPONSE:

7. Any journals, diaries, logs or other documents or recordings kept by the plaintiff.

RESPONSE:

8. All documents which you provided to, or upon which any expert retained by you in connection with this lawsuit relies in forming his or her opinion.

RESPONSE:

9. Copies of all correspondence or written or recorded report made by each physician or other medical personnel to whom you have gone for consultation or examination concerning your physical, mental, or emotional condition.

RESPONSE:

10. All documents upon which you intend to rely at trial.

RESPONSE:

11. All documents which tend to support or refute any of your claims against the medical defendants.

RESPONSE:

12. Copies of every grievance and/or sick call request you submitted relevant to the claims in the Complaint.

RESPONSE:

BALICK & BALICK L.L.C.

/s/ James E. Drnec
James E. Drnec (DE Bar # 3789)
711 King Street
Wilmington, DE 19801
(302) 658-4265
Attorneys for Correctional Medical Services, Inc.

Dated: August 6, 2008

CERTIFICATE OF SERVICE

I, James Drnec, hereby certify that on the 7th day of August, 2008, the foregoing Defendant Correctional Medical Services, Inc's First Set of Requests For Production Of Documents Directed to Plaintiff were filed via CM/ECF and served First Class Mail upon the following:

Adam Wenzke
SBI# 182595
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

/s/ James E. Drnec
James E. Drnec, Esquire (#3789)

CERTIFICATE OF SERVICE

I, James Drnec, hereby certify that on the 7th day of August, 2008, the foregoing Defendant Correctional Medical Services, Inc's First Set of Requests For Production Of Documents Directed to Plaintiff were filed via CM/ECF and served First Class Mail upon the following:

Adam Wenzke
SBI# 182595
Delaware Correctional Center
1181 Paddock Road
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/s/ James E. Drnec
James E. Drnec, Esquire (#3789)